

### **REMARKS**

Entry of this amendment and reconsideration of this application, as amended, are respectfully requested.

It is believed that the amendments or cancellation of claims overcome the § 112 first and second paragraph rejections.

It is believed that the 35 U.S.C. §101 issue has been rendered moot by the amendments to claims 110 and 111.

Claims 41-96 and 107-109 were rejected under 35 U.S.C. §103(a) over Gros in view of Koegler. Claims 41-57, 63-66, 71-78, 81-84, 87-90, 93, 94, 108-111 and 114-117 were rejected under 35 U.S.C. §103(a) over Emmons in view of Koegler. Claims 41-66, 69-92, 95-96 and 107-109 were rejected under 35 U.S.C. §103(a) over Stevenson in view of Koegler. Claims 58-59 and 85-86 were rejected under 35 U.S.C. §103(a) over Gros in view of Koegler or Emmons in view of Koegler, further in view of Kogure. Claims 67-68, 87-88 and 93-94 were rejected under 35 U.S.C. §103(a) over Stevenson in view of Koegler or Emmons in view of Koegler, further in view of Shustack. Claims 110-111 and 116-117 were rejected under 35 U.S.C. §103(a) over Gros in view of Koegler or Stevenson in view of Koegler, further in view of Shustack. Claims 110-111 and 116-117 were rejected under 35 U.S.C. §103(a) over Gros or Stevenson in view of Koegler, further in view of Emmons. Claims 114-115 were rejected under 35 U.S.C. §103(a) over Gros in view of Koegler, Anderson and Field. Applicants respectfully traverse each of these rejections.

Koegler only relates to thick-layer coating of metallic substrates (col. 1, lines 10-11). At page 28 of the office action, the Examiner says she disagrees with this argument and alleges that one of ordinary skill in the art would have a reasonable expectation of success in applying

thinner coating to metallic substrates at the same speed. However, the Examiner has not provided any reasoning or objective evidence as to why one would modify Koegler in this way, or even look to Koegler in view of his teaching away from the use of thinner coatings.

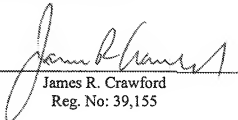
Furthermore, the independent claims have been rewritten to recite that the composition "consists of" its recited components, which is believed to sufficiently distinguish from the cited references (Applicants did this solely to expedite prosecution in response to the Examiner's comments regarding the "open ended nature of certain claims at page 28 of the office action). Thus, all rejections should be withdrawn.

Allowance is respectfully requested.

If any fee are due enter this amendment or to maintain pendency of this application, authorization is given to charge such fees to deposit account no: 50-0624.

Respectfully submitted,

**FULBRIGHT & JAWORSKI L.L.P.**

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